

Remarks

Reconsideration of the above-captioned patent application is respectfully requested in view of the following remarks. Applicant is amending claims 12 and 13. Therefore, claims 2, 4, 5, 7 and 9-13 currently are pending in the above-captioned patent application, and are subject to examination. No new matter is added by the foregoing amendments, and these amendments are fully supported by the specification. Applicant respectfully requests that the Examiner reconsider the above-captioned patent application in view of the foregoing amendments and the following remarks.

In the Office Action mailed April 6, 2004, and the Advisory Action mailed August 16, 2004, the Examiner rejected claims 2, 4, 5, 7, and 9-13 under 35 U.S.C. § 103(a), as allegedly being rendered obvious by U.S. Patent No. 6,441,819 to Suzuoki in view of U.S. Patent No. 5,434,591 to Goto *et al.* ("Goto"). Specifically, the Examiner asserts that Suzuoki discloses or suggest most of the limitations of independent claims 12 and 13. However, the Examiner acknowledges that Suzuoki fails to disclose or suggest an image displaying system in which during scrolling, the image only is represented by the data group indicating the indispensable points. See, e.g., Office Action, Page 4, Lines 1-4. Nevertheless, the Examiner asserts that Goto supplies these missing elements, and that it would have been obvious to those of ordinary skill in the art at the time the invention was made to modify the image displaying system described in Suzuoki, such that during scrolling, the image only is represented by the data group indicating the indispensable points. See, e.g., *Id.* at Lines 4-12.

In order for the Examiner to establish a prima facie case for obviousness, three (3) criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to those of ordinary skill in the art, to modify the primary reference as the Examiner proposes. Second, there must be a reasonable expectation of success in connection with the Examiner's proposed combination of the references. And third, the prior art references must disclose or suggest all of the claim limitations. MPEP 2143 (emphasis added.) Applicant maintains that the Examiner fails to establish a prima facie case for obviousness because the Examiner fails to establish that Goto discloses or suggests an image displaying system in which during scrolling, the image only is represented by the data group indicating the indispensable points. Moreover, the Examiner acknowledges that Suzuki does not disclose or suggest these limitations.

Applicant has amended independent claim 12 to describe a method of displaying an image comprising the steps of "classifying vector data, indicating a plurality of points for displaying the image, into a group of data comprising indispensable points, wherein a number of the plurality of points included in the indispensable points is **substantially equal to a minimum number of the plurality of points required to recognize the image**, . . . wherein the image is represented **only** by the data group **comprising the indispensable points when being scrolled** on a screen." (Emphasis added.) Similarly, independent claim 13 describes a system for displaying an image comprising "a data storage member for classifying vector data, indicating a plurality of points for representing the image, into a data group comprising indispensable points, wherein a

number of the plurality of points included in the indispensable points **is substantially equal to a minimum number of the plurality of points required to recognize the image**, . . . wherein said image quality selection member selects the image display represented **only** by the data group **comprising the indispensable points when the image is scrolled** on a screen.” (Emphasis added.) Thus, in Applicant’s claimed invention, during scrolling of an image through a screen, only those points which are required for minimal recognition of the image are used to represent the image. Moreover, during scrolling, the number of points representing the image remains constant, such constant number of points corresponding to the indispensable points.

In contrast, Goto describes a system for displaying graphic data in which “a characteristic of the data is altered, according to the speed of the scrolling, to facilitate the viewing of the data as the data is scrolled”. Goto, Abstract, Lines 2-4. Specifically, “a selected part of the data is omitted from the display during scrolling so that a reduced amount of data is displayed, **the amount of reduction in displayed data being proportional to the scrolling period**.” *Id.* at Lines 5-8 (emphasis added.) Because the amount of graphic data displayed changes during scrolling based on the scrolling period, the image displaying system described in Goto does not display only the minimum number of points which are required to recognize the image. In contrast, in Applicant’s claimed invention, during scrolling, the number of points used to represent the image remains constant, and the constant number of points used to represent the image during scrolling corresponds to the “indispensable points.” Therefore, Applicant

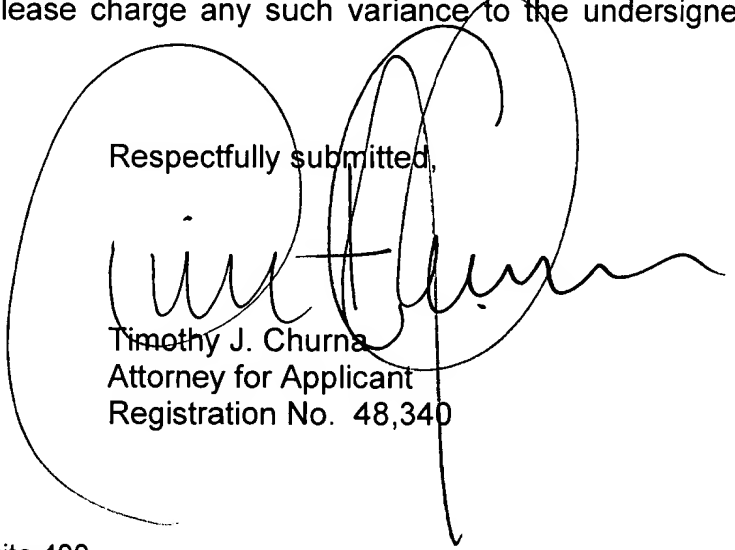
respectfully requests that the Examiner withdraw the obviousness rejection of independent claims 12 and 13.

Claims 2, 4, 5, 7, and 9-11 depend from allowable independent claims 12 and 13, respectively. Therefore, Applicant respectfully requests that the Examiner also withdraw the obviousness of claims 2, 4, 5, 7 and 9-11.

CONCLUSION

Applicant respectfully submits that the above-captioned patent application is in condition for allowance, and such action is earnestly requested. If the Examiner believes that an in-person or telephonic interview with Applicant's representatives would expedite the prosecution of the above-captioned patent application, the Examiner is invited to contact the undersigned attorney of records. Applicant is including a Petition for a Two-Month Extension of Time, and a check including the amount of \$420 covering the large entity fee for such an extension of time. Nevertheless, in the event of any variance between the fees determined by Applicant and those determined by the U.S. Patent and Trademark Office, please charge any such variance to the undersigned's Deposit Account No. 01-2300.

Respectfully submitted,


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Enclosure: Petition for Two-Month Extension of Time